

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**PETER ENEA, VICTOR MCLEAN,
CHANTAY DINGLE-EL, KENNY
ALTIDOR, individually and on behalf of
others similarly situated,**

Plaintiffs,

v.

BLOOMBERG L.P.,

Defendant.

Case No. 12 CV 4656 (GBD)(FM)

**NOTICE OF MOTION FOR PRELIMINARY APPROVAL OF CLASS SETTLEMENT,
APPROVAL OF PLAINTIFFS' PROPOSED NOTICE OF SETTLEMENT, AND OTHER
RELIEF**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Motion for Preliminary Approval of Class Settlement, Approval of Plaintiffs' Proposed Notice of Settlement, and Other Relief and in the Declaration of Dan Getman and supporting documents, Plaintiffs respectfully request that the Court enter an Order:

1. granting Plaintiffs' request to include all GTEC Reps employed during the Class Period, as defined in the parties' Settlement, in the Class, including GTEC Reps hired since the filing of the complaint on June 14, 2012, and excluding "Pre-Settlement Opt-Outs" as defined by the Settlement;
2. preliminary approving the Settlement attached as Exhibit 1 to the Declaration of Dan Getman;
3. approving the Settlement Forms attached to this Notice of Motion as Exhibit 1;
4. granting Plaintiffs' request that signed Settlement Claim Forms be deemed filed with the Court in satisfaction of the requirements of 29 U.S.C. § 216(b);
5. permitting the parties to choose a Settlement Administrator; and

6. scheduling the Final Approval Hearing to approve the Settlement.

Plaintiffs have contemporaneously submitted a Proposed Order, attached hereto as Exhibit 2, for the Court's convenience.

Dated: May 12, 2016

Respectfully submitted,

By: /s/ Dan Getman
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